

From: [Herrick, Jordan](#)
To: "Steve New"
Cc: [Emilee Wooldridge](#); [Amanda Taylor](#); [Zachary Kyle Whitten](#); tim@luparduslaw.com; robertdunlapessq@gmail.com; [Shuman, David](#); [Hebel, Hannah](#)
Subject: RE: Rose v. Wexford (File #: 8650-136) - Claim No: WHS-SIR-22-528244
Date: Thursday, October 24, 2024 12:33:07 PM
Attachments: [image001.png](#)
[image002.png](#)

Last day to serve discovery requests was September 24, 2024. See Doc. No. 949. I'll file my motion.



Jordan K. Herrick, Esquire

Bailey & Wyant, PLLC

500 Virginia Street East, Suite 600

Charleston, West Virginia 25301

Direct Dial: 304.720.0715

T: 304.345.4222 | F: 304.343.3133

M: 304.771.2944



This electronic message transmission contains information from the law firm of Bailey & Wyant, P.L.L.C. which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this electronic transmission in error, please notify us by telephone at (304) 345-4222 immediately.

From: Steve New <[steve@newLawoffice.com](mailto:steve@newlawoffice.com)>

Sent: Thursday, October 24, 2024 12:31 PM

To: Herrick, Jordan <jherrick@baileywyant.com>

Cc: [Emilee Wooldridge](mailto:emilee@newLawoffice.com) <emilee@newLawoffice.com>; [Amanda Taylor](mailto:amanda@thtwv.com) <amanda@thtwv.com>; [Zachary Kyle Whitten](mailto:zwhittenlaw@gmail.com) <zwhittenlaw@gmail.com>; tim@luparduslaw.com; robertdunlapessq@gmail.com; [Shuman, David](mailto:dshuman@baileywyant.com) <dshuman@baileywyant.com>; [Hebel, Hannah](mailto:hhebel@baileywyant.com) <hhebel@baileywyant.com>

Subject: Re: Rose v. Wexford (File #: 8650-136) - Claim No: WHS-SIR-22-528244

EXTERNAL EMAIL

We are issuing them. The discovery deadline is Nov 8.

We will file an emergency motion to compel and seek sanctions.

Steve New

On Oct 24, 2024, at 12:05 PM, Herrick, Jordan <jherrick@baileywyant.com> wrote:

Counsel:

Regarding the attached two Notice of Issuances of Subpoenas, please be advised that we object to same as being untimely given the discovery deadline passed a month ago. Additionally, the medical records of Desarae Godsey, James Vest and Trevor Shrewsbury were previously produced. To the extent you are not willing to withdraw these Notices, we plan to file a Motion for Protective Order by the close of business tomorrow. Please allow this to serve as my good faith attempt confer with Plaintiffs' counsel concerning this discovery issue without court intervention pursuant to LR Civ. P. 37.(b).

Sincerely,

Jordan K. Herrick, Esquire

Bailey & Wyant, PLLC
500 Virginia Street East, Suite 600
Charleston, West Virginia 25301
Direct Dial: 304.720.0715
T: 304.345.4222 | F: 304.343.3133
M: 304.771.2944

This electronic message transmission contains information from the law firm of Bailey & Wyant, P.L.L.C. which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this electronic transmission in error, please notify us by telephone at (304) 345-4222 immediately.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).